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## Privacy policy

-Translated with [www.DeepL.com/Translator](http://www.DeepL.com/Translator)-

### Introduction

With the following privacy policy, we would like to inform you about what types of your personal data (hereinafter also referred to as "data") we process, for what purposes and to what extent. The privacy policy applies to all processing of personal data carried out by us, both in the context of the provision of our services and in particular on our websites, in mobile applications and within external online presences, such as our social media profiles (hereinafter collectively referred to as "online offer").

The terms used are not gender-specific.

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## Person responsible

HANS HEPP GmbH & Co. KG  
Georgswerder Damm 16  
DE-20539 HAMBURG

Persons authorised to represent the company: Christian Beckmann

**E-mail address:** [zentrale@hanshepp.de](mailto:zentrale@hanshepp.de)

**Telephone:** +49 (0)40 780468-0

**Imprint:** <https://www.hanshepp.de/impressum/>

## Contact data protection officer

HANS HEPP GmbH & Co. KG is not obliged to appoint a data protection officer. However, as a data subject, you have the option of sending your concerns to [datenschutz@hanshepp.de](mailto:datenschutz@hanshepp.de).

## Overview of the processing operations

The following overview summarises the types of data processed and the purposes of their processing on our website and refers to the data subjects.

### Types of data processed

- Inventory data (e.g. names, addresses).
- Content data (e.g. text entries, photographs, videos).
- Contact data (e.g. e-mail, telephone numbers).
- Meta/communication data (e.g. device information, IP addresses).
- Usage data (e.g. websites visited, interest in content, access times).

### Categories of affected persons

- Interested parties.
- Communication partners.
- Users (e.g. website visitors, users of online services).

### Purposes of the processing

- Visit action evaluation.
- Interest-based and behavioural marketing.
- Contact requests and communication.



- Conversion measurement (measurement of the effectiveness of marketing measures).
- Profiling (creation of user profiles).
- Remarketing.
- Reach measurement (e.g. access statistics, recognising returning visitors).
- Tracking (e.g. interest/behavioural profiling, use of cookies).

## Relevant legal bases

In the following, we inform you of the legal basis of the **German** General Data Protection Regulation (GDPR), on the basis of which we process personal data. Please note that in addition to the provisions of the GDPR, the national data protection regulations in your or our country of residence and domicile may apply. Should more specific legal bases also apply in individual cases, we will inform you of these in the privacy policy.

- **Consent (Art. 6 para. 1 sentence 1 lit. a GDPR)** - The data subject has given their consent to the processing of their personal data for a specific purpose or several specific purposes.
- **Contract fulfilment and pre-contractual enquiries (Art. 6 para. 1 sentence 1 lit. b. GDPR)** - Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
- **Legitimate interests (Art. 6 para. 1 sentence 1 lit. f. GDPR)** - Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.

**National data protection regulations in Germany:** In addition to the data protection regulations of the General Data Protection Regulation, national data protection regulations apply in Germany. These include, in particular, the Act on Protection against Misuse of Personal Data in Data Processing (Federal Data Protection Act - BDSG). In particular, the BDSG contains special regulations on the right to information, the right to erasure, the right to object, the processing of special categories of personal data, processing for other purposes and transmission as well as automated decision-making in individual cases, including profiling. It also regulates data processing for the purposes of the employment relationship (Section 26 BDSG), in particular with regard to the establishment, implementation or termination of employment relationships and the consent of employees. The data protection laws of the individual federal states may also apply.

## Security measures

We take appropriate technical and organisational measures in accordance with the legal requirements, taking into account the state of the art, the implementation costs and the nature, scope, circumstances and purposes of the processing as well as the different probabilities of occurrence and the extent of the threat to the rights and freedoms of natural persons, in order to ensure a level of protection appropriate to the risk.



The measures include, in particular, safeguarding the confidentiality, integrity and availability of data by controlling physical and electronic access to the data as well as access, input, disclosure, safeguarding availability and separation of the data. Furthermore, we have established procedures that ensure the exercise of data subject rights, the deletion of data and reactions to the jeopardisation of data. Furthermore, we already take the protection of personal data into account during the development and selection of hardware, software and processes in accordance with the principle of data protection, through technology design and data protection-friendly default settings.

**Shortening of the IP address:** If it is possible for us or if it is not necessary to store the IP address, we shorten or have your IP address shortened. In the case of IP address truncation, also known as "IP masking", the last octet, i.e. the last two digits of an IP address, are deleted (in this context, the IP address is an identifier individually assigned to an Internet connection by the online access provider). The purpose of shortening the IP address is to prevent or make it much more difficult to identify a person by their IP address.

**SSL encryption (https):** We use SSL encryption to protect your data transmitted via our online offering. You can recognise such encrypted connections by the prefix https:// in the address bar of your browser.

## Transfer and disclosure of personal data

As part of our processing of personal data, the data may be transferred to other bodies, companies, legally independent organisational units or persons or disclosed to them. The recipients of this data may include, for example, payment institutions in the context of payment transactions, service providers commissioned with IT tasks or providers of services and content that are integrated into a website. In such cases, we observe the legal requirements and in particular conclude corresponding contracts or agreements with the recipients of your data that serve to protect your data.

**Data transfer within the organisation:** We may transfer personal data to other bodies within our organisation or grant them access to this data. If this transfer takes place for administrative purposes, the transfer of the data is based on our legitimate business and commercial interests or takes place if it is necessary to fulfil our contractual obligations or if the consent of the data subjects or legal permission has been obtained.

## Data processing in third countries

If we process data in a third country (i.e. outside the European Union (EU), the European Economic Area (EEA)) or if the processing takes place in the context of the use of third-party services or the disclosure or transfer of data to other persons, bodies or companies, this will only take place in accordance with the legal requirements.



Subject to express consent or transfer required by contract or law, we only process or have the data processed in third countries with a recognised level of data protection, including US processors certified under the "Privacy Shield", or on the basis of special guarantees, such as contractual obligations through so-called standard protection clauses of the EU Commission, the existence of certifications or binding internal data protection regulations (Art. 44 to 49 GDPR, information page of the EU Commission: [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection\\_de](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection_de) ).

## Use of cookies

Cookies are text files that contain data from websites or domains visited and are stored by a browser on the user's computer. A cookie is primarily used to store information about a user during or after their visit to an online service. The information stored may include, for example, the language settings on a website, the login status, a shopping basket or the location where a video was watched. The term "cookies" also includes other technologies that fulfil the same functions as cookies (e.g. when user information is stored using pseudonymous online identifiers, also known as "user IDs")

**A distinction is made between the following cookie types and functions:**

- **Temporary cookies (also: session cookies):** Temporary cookies are deleted at the latest after a user has left an online service and closed their browser.
- **Permanent cookies:** Permanent cookies remain stored even after the browser is closed. For example, the login status can be saved or favourite content can be displayed directly when the user visits a website again. The interests of users that are used for reach measurement or marketing purposes can also be stored in such a cookie.
- **First-Party-Cookies:** First-party cookies are set by us.
- **Third-party cookies:** Third-party cookies are mainly used by advertisers (so-called third parties) to process user information.
- **Necessary (also: essential or absolutely necessary) cookies:** Cookies may be absolutely necessary for the operation of a website (e.g. to save logins or other user input or for security reasons).
- **Statistical, marketing and personalisation cookies:** Cookies are also generally used to measure reach and when a user's interests or behaviour (e.g. viewing certain content, using functions, etc.) on individual websites are stored in a user profile. Such profiles are used, for example, to display content to users that corresponds to their potential interests. This process is also referred to as "tracking", i.e. tracing the potential interests of users. . If we use cookies or "tracking" technologies, we will inform you separately in our privacy policy or when obtaining consent.

**Notes on legal bases:** The legal basis on which we process your personal data with the help of cookies depends on whether we ask you for your consent. If this is the case and you consent to the use of cookies, the legal basis for processing your data is the



consent you have given. Otherwise, the data processed using cookies will be processed on the basis of our legitimate interests (e.g. in the business operation of our online offering and its improvement) or, if the use of cookies is necessary to fulfil our contractual obligations.

**General information on revocation and objection (opt-out):** Depending on whether the processing is based on consent or legal permission, you have the option at any time to revoke any consent you have given or to object to the processing of your data by cookie technologies (collectively referred to as "opt-out"). You can initially declare your objection using your browser settings, e.g. by deactivating the use of cookies (although this may also restrict the functionality of our online offering). An objection to the use of cookies for online marketing purposes can also be declared using a variety of services, especially in the case of tracking, via the websites <https://optout.aboutads.info> and <https://www.youronlinechoices.com/>. You can also obtain further information on how to object in the context of the information on the service providers and cookies used.

**Processing of cookie data on the basis of consent:** Before we process or have data processed in the context of the use of cookies, we ask users for their consent, which can be revoked at any time. Before consent has not been given, cookies that are necessary for the operation of our online offering are used at most. Their use is based on our interest and the interest of users in the expected functionality of our online offering.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Legal basis:** Consent (Art. 6 para. 1 sentence 1 lit. a GDPR), Legitimate interests (Art. 6 para. 1 sentence 1 lit. f. GDPR).

## Contact us

If you send us enquiries via the contact form provided on the website, your details from the form, including the contact details you provide there (e.g. name, email address, message), will be stored by us for the purpose of processing the enquiry and in the event of follow-up questions. This data will not be passed on to third parties without your consent.

The data entered in the contact form is processed on the basis of Art. 6 para. 1 lit. b GDPR (for the implementation of pre-contractual measures) or on the basis of our legitimate interest pursuant to Art. 6 para. 1 lit. f GDPR in processing your enquiry.

Your data will be deleted as soon as it is no longer required for processing, unless statutory retention periods prevent this. Processed data types: Inventory data (e.g. names, addresses), contact data (e.g. e-mail, telephone numbers), content data (e.g. text input, photographs, videos).

- **Data subjects:** Communication partners.



- **Purposes of processing:** Contact enquiries and communication.
- **Legal bases:** Contract fulfilment and pre-contractual enquiries (Art. 6 Para. 1 S. 1 lit. b. GDPR), Legitimate interests (Art. 6 Para. 1 S. 1 lit. f. GDPR).

## Provision of the online offer and web hosting

In order to provide our online offering securely and efficiently, we utilise the services of one or more web hosting providers from whose servers (or servers managed by them) the online offering can be accessed. For these purposes, we may utilise infrastructure and platform services, computing capacity, storage space and database services as well as security services and technical maintenance services.

The data processed as part of the provision of the hosting service may include all information relating to the users of our online service that is generated during use and communication. This regularly includes the IP address, which is necessary in order to be able to deliver the content of online offers to browsers, and all entries made within our online offer or from websites.

**Collection of access data and log files:** We ourselves (or our web hosting provider) collect data on every access to the server (so-called server log files). The server log files may include the address and name of the web pages and files accessed, date and time of access, data volumes transferred, notification of successful access, browser type and version, the user's operating system, referrer URL (the previously visited page) and, as a rule, IP addresses and the requesting provider.

The server log files can be used for security purposes, e.g. to avoid overloading the servers (especially in the event of abusive attacks, so-called DDoS attacks) and to ensure the utilisation of the servers and their stability.

- **Processed data types:** Content data (e.g. text input, photographs, videos), usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services).
- **Legal basis:** Legitimate interests (Art. 6 para. 1 sentence 1 lit. f. GDPR).

## Online marketing

We process personal data for online marketing purposes, which may include in particular the marketing of advertising space or the presentation of advertising and other content (collectively referred to as "content") based on the potential interests of users and the measurement of its effectiveness.

For these purposes, so-called user profiles are created and stored in a file (so-called "cookie") or similar procedures are used, by means of which the information about the user relevant to the presentation of the aforementioned content is stored. This information may include, for example, content viewed, websites visited, online



networks used, but also communication partners and technical information such as the browser used, the computer system used and information on usage times. If users have consented to the collection of their location data, this can also be processed.

The IP addresses of users are also stored. However, we use available IP masking procedures (i.e. pseudonymisation by shortening the IP address) to protect users. In general, no clear user data (such as e-mail addresses or names) is stored as part of the online marketing process, but pseudonyms. This means that neither we nor the providers of the online marketing processes know the actual identity of the users, but only the information stored in their profiles.

The information in the profiles is generally stored in cookies or by means of similar procedures. These cookies can generally also be read later on other websites that use the same online marketing process and analysed for the purpose of displaying content as well as supplemented with further data and stored on the server of the online marketing process provider.

In exceptional cases, clear data can be assigned to the profiles. This is the case, for example, if the users are members of a social network whose online marketing process we use and the network links the user profiles with the aforementioned data. Please note that users can make additional agreements with the providers, e.g. by giving their consent during registration.

In principle, we only receive access to summarised information about the success of our advertisements. However, as part of so-called conversion measurements, we can check which of our online marketing procedures have led to a so-called conversion, i.e., for example, to the conclusion of a contract with us. The conversion measurement is used solely to analyse the success of our marketing measures.

Unless otherwise stated, we ask you to assume that cookies used are stored for a period of two years.

**Notes on legal bases:** If we ask users for their consent to the use of third-party providers, the legal basis for the processing of data is consent. Otherwise, user data is processed on the basis of our legitimate interests (i.e. interest in efficient, economical and recipient-friendly services). In this context, we would also like to draw your attention to the information on the use of cookies in this privacy policy.

- **Processed data types:** Usage data (e.g. websites visited, interest in content, access times), meta/communication data (e.g. device information, IP addresses).
- **Data subjects:** Users (e.g. website visitors, users of online services), interested parties.
- **Purposes of Processing:** Targeting (e.g. profiling based on interests and behaviour, use of cookies), Remarketing, Conversion Tracking, Interest-based and behavioral marketing, Profiling (Creating user profiles), Conversion tracking (Measurement of the effectiveness of marketing activities), Web Analytics (e.g. access statistics, recognition of returning visitors).



- **Security measures:** IP masking (pseudonymisation of the IP address).
- **Legal basis:** Consent (Art. 6 para. 1 sentence 1 lit. a GDPR), Legitimate interests (Art. 6 para. 1 sentence 1 lit. f. GDPR).
- **Possibility of objection (opt-out):** We refer to the data protection notices of the respective providers and the opt-out options provided by the providers (so-called "opt-out"). If no explicit opt-out option has been specified, you have the option of switching off cookies in your browser settings. However, this may restrict the functions of our online offer. We therefore recommend the following additional opt-out options, which are summarised for the respective areas:
  - a) Europe: <https://www.youronlinechoices.eu>.
  - b) Canada: <https://www.youradchoices.ca/choices>.
  - c) USA: <https://www.aboutads.info/choices>.
  - d) Cross-territory: <https://optout.aboutads.info>.

### Services used and service providers:

- **Google Analytics:** Online marketing and web analytics;  
Service provider: Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, parent company: Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA;  
Website: <https://marketingplatform.google.com/intl/de/about/analytics/>;  
Privacy Policy: <https://policies.google.com/privacy>;  
Privacy Shield (Safeguarding the level of data protection when processing data in the USA):  
<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>;  
Opt-Out: Opt-out plugin: <https://tools.google.com/dlpage/gaoptout?hl=de>,  
Settings for the display of adverts:  
<https://adssettings.google.com/authenticated>

## Deletion of data

The data processed by us will be deleted in accordance with the legal requirements as soon as the consent given for processing is revoked or other authorisations cease to apply (e.g. if the purpose for processing this data no longer applies or it is not required for the purpose).

If the data is not deleted because it is required for other and legally permissible purposes, its processing will be restricted to these purposes. This means that the data is blocked and not processed for other purposes. This applies, for example, to data that must be retained for commercial or tax law reasons or whose storage is necessary for the assertion, exercise or defence of legal claims or to protect the rights of another natural or legal person.

Further information on the deletion of personal data can also be found in the individual data protection notices of this privacy policy



# Amendment and updating of the privacy policy

We ask you to inform yourself regularly about the content of our privacy policy. We will adapt the privacy policy as soon as changes to the data processing we carry out make this necessary. We will inform you as soon as the changes require your cooperation (e.g. consent) or other individual notification.

If we provide addresses and contact information of companies and organisations in this privacy policy, please note that the addresses may change over time and please check the information before contacting us.

## Rights of the data subjects

As a data subject, you are entitled to various rights under the GDPR, which arise in particular from Art. 15 to 18 and 21 GDPR:

- **Right to object:** You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on point (e) or (f) of Article 6(1) GDPR, including profiling based on those provisions. If the personal data concerning you are processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such marketing, which includes profiling to the extent that it is related to such direct marketing.
- **Right to withdraw consent:** You have the right to withdraw your consent at any time.
- **Right to information:** You have the right to request confirmation as to whether the data in question is being processed and to request information about this data as well as further information and a copy of the data in accordance with the legal requirements.

**Right to rectification:** In accordance with the legal requirements, you have the right to request the completion of data concerning you or the correction of incorrect data concerning you.-

- **Right to erasure and restriction of processing:** In accordance with the statutory provisions, you have the right to demand that data concerning you be erased immediately or, alternatively, to demand that the processing of the data be restricted in accordance with the statutory provisions.
- **Right to data portability:** You have the right to receive the data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format in accordance with the legal requirements or to request its transmission to another controller.
- **Complaint to the supervisory authority:** You also have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you



consider that the processing of personal data relating to you infringes the GDPR.

### Supervisory authority responsible for us:

The Hamburg Commissioner for Data Protection and Freedom of Information  
Ludwig-Erhard-Str 22, 7th floor  
DE-20459 Hamburg  
Telephone: (040) 428 54 – 4040  
E-mail: [mailbox@datenschutz.hamburg.de](mailto:mailbox@datenschutz.hamburg.de)

## Definitions of terms

This section provides you with an overview of the terms used in this privacy policy. Many of the terms are taken from the law and are defined above all in Art. 4 GDPR. The legal definitions are binding. The following explanations, on the other hand, are primarily intended to aid understanding. The terms are listed in alphabetical order.

- **Visit action evaluation:** "Conversion tracking" refers to a process that can be used to determine the effectiveness of marketing measures. For this purpose, a cookie is usually stored on the user's device within the websites on which the marketing measures take place and then retrieved again on the target website. For example, we can track whether the adverts we placed on other websites were successful).
- **IP-Masking:** IP masking" is a method in which the last octet, i.e. the last two numbers of an IP address, is deleted so that the IP address can no longer be used to uniquely identify a person. IP masking is therefore a means of pseudonymising processing procedures, particularly in online marketing
- **Interest-based and behavioural marketing:** Interest-based and/or behaviour-based marketing is when the potential interests of users in advertisements and other content are predetermined as precisely as possible. This is done on the basis of information about their previous behaviour (e.g. visiting certain websites and spending time on them, purchasing behaviour or interaction with other users), which is stored in a so-called profile. Cookies are generally used for these purposes.
- **Conversion measurement:** Conversion measurement is a process that can be used to determine the effectiveness of marketing measures. For this purpose, a cookie is usually stored on the user's device within the websites on which the marketing measures take place and then retrieved again on the target website. For example, this allows us to track whether the adverts we have placed on other websites have been successful.
- **Personal data:** "Personal data" means any information relating to an identified or identifiable natural person (hereinafter "data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier (e.g. cookie) or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.



- **Profiling:** Profiling means any form of automated processing of personal data consisting of the use of personal data to analyse, evaluate or predict certain personal aspects relating to a natural person (depending on the type of profiling, this includes information relating to age, gender, location data and movement data, interaction with websites and their content, shopping behaviour, social interactions with other people) (e.g. interests in certain content or products, click behaviour on a website or location). Cookies and web beacons are often used for profiling purposes.
- **Reach measurement:** Reach measurement (also known as web analytics) is used to evaluate the flow of visitors to an online offering and can include the behaviour or interests of visitors in certain information, such as website content. With the help of reach analysis, website owners can, for example, recognise at what time visitors visit their website and what content they are interested in. This enables them, for example, to better adapt the content of the website to the needs of their visitors. For the purposes of reach analysis, pseudonymous cookies and web beacons are often used to recognise returning visitors and thus obtain more precise analyses of the use of an online offer.
- **Remarketing:** Remarketing" or "retargeting" is when, for example, it is noted for advertising purposes which products a user was interested in on a website in order to remind the user of these products on other websites, e.g. in adverts.
- **Tracking:** The term "tracking" is used when the behaviour of users can be traced across several online offers. As a rule, behavioural and interest information is stored in cookies or on the servers of the providers of the tracking technologies with regard to the online services used (so-called profiling). This information can then be used, for example, to display adverts to users that are likely to match their interests.
- **Responsible person:** The "controller" is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- **Processing:** "Processing" means any operation or set of operations which is performed on personal data, whether or not by automated means. The term is broad and encompasses practically every handling of data, whether it is collecting, analysing, storing, transmitting or deleting.